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January 20, 2006

National Association of Swine Records

Mr. Martin E. O'Connor, Chief Standardization Branch Livestock and Seed Program Agricultural Marketing Service, USDA 1400 Independence Avenue, S.W., Room 2607-S Washington, D.C. 20250

Dear Sir:

Regarding the December 6, 2005, USDA Listening Session, the National Association of Swine Records (NASR) would like to enter the following statements to be submitted in response.

- 1. The NASR is an organization representing the eight largest pedigreed swine breeds (Berkshire, Chester White, Duroc, Hampshire, Landrace, Poland, Spot and Yorkshire) found in the United States.
- 2. Since the mid 1800's when many breed associations were formed, documented ancestry records have been submitted to breed associations. Respective breed requirements were set by the by-laws and policies that were put in place by each breed association and its membership.
- 3. To be eligible for registration, documented records of ancestry must be submitted in timely and professional manner.
- 4. These records are maintained at each respective breed association.
- 5. These records along with the policies set by each respective breed association have created the tradition and inherent right for each respective breed association and their membership to identify the guidelines that allow animals to be pedigreed and to maintain breed purity through these records.
- 6. Through the use of pedigrees, improvements in animal breeding have contributed to the quality of swine production in the United States and worldwide.
- 7. Breed associations and their members have taken an aggressive approach to supplying specific pork products that are found in their respective breed.
- 8. Swine breed associations have recognized the importance of the use of genomic tools in swine breeding to identify specific DNA markers but do not feel that the USDA, AMS or FSIS or any other government organizations as well as any commercial genomic company has the right to mandate what determines the genetic composition of a respective breed.

In conclusion, the NASR strongly urges the USDA and AMS to maintain the inherent rights of each breed association to determine the breed identity and pedigree animals that meet their respective breed requirements along with other products that are being marketed under the breed name or identification. We thank you for consideration of this concern.

Mike Paul

Sincerely

President, National Association of Swine Records